

**REMARKS**

Claims 1-24 are now pending in the application. The amendments to the claims contained herein are of equivalent scope as originally filed and, thus, are not a narrowing amendment. The Examiner is respectfully requested to reconsider and withdraw the rejection(s) in view of the amendments and remarks contained herein.

**EXAMINER INTERVIEW REQUESTED**

If the following amendments and remarks do not persuade the Examiner, Applicants' representative kindly requests a telephonic interview to remove issues, amend claims, and/or determine that no further progress can be made. Applicant is hopeful that the Examiner would grant this request in the interest of resolving any open issues in this application.

**ALLOWABLE SUBJECT MATTER**

The Examiner allowed claims 9-19. Applicants gratefully acknowledges such allowance.

The Examiner states that claims 2-8 and 21-24 would be allowable if rewritten in independent form. Applicants elect to defer rewriting the allowable claims until the Examiner has reconsidered the rejections in view of the amendments and arguments presented herein.

**REJECTION UNDER 35 U.S.C. § 102**

Claims 1 and 20 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Pat. No. 5,614,813 (Batson). This rejection is respectfully traversed.

With respect to amended claim 1, Applicants respectfully traverse the rejection. In particular, Applicants respectfully submit that Batson fails to anticipate a power module having a digital data input. Further, Applicants respectfully submit that Batson fails to anticipate a sensor module having a digital data output and generating a digital data sensor signal on the digital data output. Further yet, Applicants respectfully submit that Batson fails to anticipate a control module having a digital data input for receiving the digital data sensor signal, a digital control data output connected to the digital data input, and generating a digital data control signal applied to the digital data input for controlling the power module.

Batson clearly fails to anticipate any of the above-mentioned features. Batson at best discloses the use of an electrical conductor to interconnect various modules. Batson clearly fails to anticipate exchanging digital data between the modules. Further yet, the control module of Batson does not anticipate a digital control data output connected to the digital data input (of the power module). In particular, the signal from the control module of Batson to the power module of Batson is described as a pulse width modulated (PWM) signal. A PWM signal clearly differs from a digital data control signal, as a digital data control signal by definition conveys information within the signal. A PWM signal is simply a control signal. That is, the PWM signal output by the control module of Batson strictly drives the switches of block 12 of Fig. 5. thus, the PWM signal is a signal for exercising control, not a signal for exchanging data.

With respect to claim 20, Applicants respectfully submit that Batson fails to anticipate claim 20. In particular, Batson clearly fails to anticipate a power module having a digital communications port. Further, Batson clearly fails to anticipate a sensor

module having a digital communications port and generating a digital sensor signal on the digital communications port. Further, Batson fails to anticipate a digital interface interconnecting the power module and the sensor module to enable digital communications therebetween. Finally, Batson fails to anticipate a control module having a digital measurement input for receiving the sensor signal, the control module generating a control signal for controlling the power module.

With respect to the power module having a digital communications port, Applicants respectfully submit that the examiner cannot interpret an electrical conductor as comprising a digital communications port. A digital communications port enables digital communication between the power module and another device. Batson at best discloses a control signal between the control module and the power module, however providing a control signal does not rise to the level of digital communication. Further, Batson cannot anticipate the digital interface, as the claimed digital interface interconnecting the power module and the sensor module enable digital communications therebetween. In Batson, the sensor simply outputs an analog signal which is converted to a digital signal. However, such communication does not qualify as digital communications therebetween. That is, there is no communication between the power module and the sensor module in Batson, and certainly not any digital communications between the power module and the sensor module.

#### **CONCLUSION**

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests

that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

Dated: Aug 5, 2003

By:   
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